

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

GREENLEAF COMPASSIONATE CARE)
CENTER, INC.,)
Plaintiff,)
v.)
MATTHEW SANTACROCE, in his official)
capacity as Deputy Director of the Rhode)
Island Department of Business Regulation;)
ERICA FERRELLI, in her official capacity as)
Chief of the Office of Cannabis Regulation)
within the Rhode Island Department of)
Business Regulation; KIMBERLY AHERN,)
in her official capacity as Chair of the Rhode)
Island Cannabis Control Commission;)
ROBERT JACQUARD, in his official)
capacity as Commissioner on the Rhode)
Island Cannabis Control Commission;)
OLAYIWOLA ODUYINGBO, in his official)
capacity as Commissioner on the Rhode)
Island Cannabis Control Commission; and)
LOCAL 328 OF THE UNITED FOOD AND)
COMMERCIAL WORKERS UNION,)
Defendants.)

Civil Action No. 1:23-cv-00282

**PLAINTIFF GREENLEAF COMPASSIONATE CARE CENTER, INC.’S ASSENTED
TO MOTION TO EXTEND TIME TO RESPOND TO STATE DEFENDANT’S MOTION
TO DISMISS AND TO FURTHER EXTEND TIME TO RESPOND TO DEFENDANT
LOCAL 328’s MOTION TO DISMISS**

Plaintiff Greenleaf Compassionate Care Center, Inc. (“Greenleaf”) respectfully requests:

(i) an extension of time, until and through October 31, 2023, of its deadline to respond to the Motion to Dismiss filed by the State Defendants on September 21, 2023, and (ii) a further extension, until and through October 31, 2023, of its deadline to respond to the Motion to Dismiss

filed by Defendant Local 328 of the United Food and Commercial Workers Union (“Local 328”) on August 25, 2023.¹

The proposed extension will provide Greenleaf with adequate time to respond to the legal and factual issues raised in the Motion to Dismiss. Greenleaf previously assented to the State Defendant’s two extensions of their time to respond to the Complaint, and the State Defendants have assented to this requested extension.

Greenleaf requests the further extension of time to respond to Local 328’s Motion to Dismiss because the State Defendant’s Motion to Dismiss and Local 328’s Motion to Dismiss share common legal and factual issues. The proposed extension will align the filing dates for the responses to both motions allow Greenleaf to coordinate those responses efficiently for the Court. Local 328 has indicated that it does not object to the requested extension.

Respectfully submitted,

GREENLEAF COMPASSIONATE
CARE CENTER, INC.

By its attorneys,

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¹ On September 8, 2023, this Court granted Greenleaf’s initial motion to extend its deadline to respond to Local 328’s motion to dismiss until September 27, 2023.

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Dated: September 22, 2023

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2023, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing.

/s/ Adam M. Ramos